

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

RYAN KING,

Plaintiff,

Case No. 18-CV-744

v.

MELISSA A. GONZALEZ, et al.,

Defendants.

**DEFENDANTS KENDRA NAVARRO AND CRISTINA DEJESUS'
PROPOSED SPECIAL VERDICT FORM**

Defendants Kendra Navarro and Cristina DeJesus, by and through their counsel, Leib Knott Gaynor LLC, submit the following Special Verdict Form to be used at trial.

QUESTION NO. 1: Did Ryan King have an objectively serious medical need between May 15, 2015, and May 18, 2015, while Kendra Navarro was working at the Racine County Jail?

Yes _____ No _____

If you answered Question No. 1 “Yes” then answer Question No. 2. Otherwise, proceed to answer Question No. 5.

QUESTION NO. 2: Was Kendra Navarro aware that Ryan King had an objectively serious medical need between May 15, 2015, and May 18, 2015?

Yes _____ No _____

If you answered Question No. 2 “Yes” then answer Question No. 3. Otherwise, proceed to answer Question No. 5.

QUESTION NO. 3: Did Kendra Navarro act with purposeful, knowing, or conscious disregard of the consequences that her actions would have on Ryan King’s serious medical need?

Yes _____ No _____

If you answered Question No. 3 “Yes” then answer Question No. 4. Otherwise, proceed to answer Question No. 5.

QUESTION NO. 4: Was Ryan King harmed as a result of Kendra Navarro’s purposeful, knowing, or conscious disregard of the consequences that her actions could have on Ryan King’s serious medical need?

Yes _____ No _____

No matter how you answered Questions Nos. 1-4, answer Question No. 5.

QUESTION NO. 5: Did Ryan King have an objectively serious medical need between May 15, 2015, and May 16, 2015, while Cristina DeJesus was working at the Racine County Jail?

Yes _____ No _____

If you answered Question No. 5 “Yes” then answer Question No. 6. Otherwise, proceed to answer Question No. 9.

QUESTION NO. 6: Was Cristina DeJesus aware that Ryan King had an objectively serious medical need between May 15, 2015, and May 16, 2016?

Yes _____ No _____

If you answered Question No. 6 “Yes” then answer Question No. 7. Otherwise, proceed to answer Question No. 9.

QUESTION NO. 7: Did Cristina DeJesus act with purposeful, knowing, or conscious disregard of the consequences that her actions could have on Ryan King’s serious medical need?

Yes _____ No _____

If you answered Question No. 7 “Yes” then answer Question No. 8. Otherwise, proceed to answer Question No. 9.

QUESTION NO. 8: Was Ryan King harmed as a result of Cristina DeJesus’ purposeful, knowing, or conscious disregard of the consequences that her actions would have on Ryan King’s serious medical need?

Yes _____ No _____

If you answered “Yes” to Question No. 4, please answer Question No. 9.

QUESTION NO. 9: What amount of money will fairly and reasonably compensate Ryan King for conscious pain and suffering caused by the acts of Kendra Navarro?

a. Conscious pain and suffering \$ _____

If you answered “Yes” to Question No. 8, please answer Question No. 10.

QUESTION NO. 10: What amount of money will fairly and reasonably compensate Ryan King for conscious pain and suffering caused by the conduct of Cristina DeJesus?

a. Conscious pain and suffering \$ _____

No matter how you answered Questions 1-10, please answer Question No. 11.

QUESTION NO. 11: Did Ryan King have an objectively serious medical need on May 14, 2015, when Officer William Becker escorted Ryan King to and from Wheaton Franciscan All Saints Hospital?

Yes _____ No _____

If you answered Question No. 11 “Yes” then answer Question No. 12. Otherwise, proceed to answer Question No. 15.

QUESTION NO. 12: Was Officer William Becker aware that Ryan King had an objectively serious medical need when he escorted Ryan King to and from Wheaton Franciscan All Saints Hospital on May 14, 2015?

Yes _____ No _____

If you answered Question No. 12 “Yes” then answer Question No. 13. Otherwise, proceed to answer Question No. 15.

QUESTION NO. 13: Did Officer William Becker act with purposeful, knowing, or conscious disregard of the consequences that his actions would have on Ryan King’s serious medical need?

Yes _____ No _____

If you answered Question No. 13 “Yes” then answer Question No. 14. Otherwise, proceed to answer Question No. 15.

QUESTION NO. 14: Was Ryan King harmed as a result of Officer William Becker’s purposeful, knowing, or conscious disregard of the consequences that his actions would have on Ryan King’s serious medical need?

Yes _____ No _____

No matter how you answered Questions Nos. 11-14, answer Question No. 15.

QUESTION NO. 15: Did Ryan King have an objectively serious medical need on May 14, 2015, when Officer Marco Verdiguél escorted Ryan King to and from Wheaton Franciscan All Saints Hospital?

Yes _____ No _____

If you answered Question No. 15 “Yes” then answer Question No. 16. Otherwise, proceed to answer Question No. 19.

QUESTION NO. 16: Was Officer Marco Verdiguél aware that Ryan King had an objectively serious medical need when he escorted Ryan King to and from Wheaton Franciscan All Saints Hospital on May 14, 2015?

Yes _____ No _____

If you answered Question No. 16 “Yes” then answer Question No. 17. Otherwise, proceed to answer Question No. 19.

QUESTION NO. 17: Did Officer Marco Verdiguél act with purposeful, knowing, or conscious disregard of the consequences that his actions would have on Ryan King’s serious medical need?

Yes _____ No _____

If you answered Question No. 17 “Yes” then answer Question No. 18. Otherwise, proceed to answer Question No. 19.

QUESTION NO. 18: Was Ryan King harmed as a result of Officer Marco Verdiguél’s purposeful, knowing, or conscious disregard of the consequences that his actions would have on Ryan King’s serious medical need?

Yes _____ No _____

If you answered “Yes” to Question No. 14, please answer Question No. 19.

QUESTION NO. 19: What amount of money will fairly and reasonably compensate Ryan King for conscious pain and suffering caused by the acts of Officer William Becker?

a. Conscious pain and suffering \$ _____

If you answered “Yes” to Question No. 18, please answer Question No. 20.

QUESTION NO. 20: What amount of money will fairly and reasonably compensate Ryan King for conscious pain and suffering caused by the conduct of Officer Marco Verdiguél?

a. Conscious pain and suffering \$_____

Please sign and return your verdict to the Court:

Dated at Milwaukee, WI on this the _____ day of October 2023.

Signed: _____
Foreperson